

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

*

LEIDOS INNOVATIONS CORPORATION, *

Plaintiff, *

v. *

THE UNITED STATES, *

Defendant. *

Case No. 18-1690 C

PLAINTIFF’S MOTION FOR A PROTECTIVE ORDER
AND MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, Leidos Innovations Corporation (“Leidos” or “Plaintiff”), through its undersigned counsel, respectfully requests that the United States Court of Federal Claims grant it leave to file its bid protest complaint under seal. Plaintiff further requests that the Court issue the standard protective order.

Plaintiff’s bid protest complaint contains information that is subject to a protective order issued by the Government Accountability Office (“GAO”) in the matter of *Leidos Innovations Corporation*, B-416377.3. Paragraph 8 of the Protective Order states:

Protected material obtained under this protective order may be used, however, in a bid protest filed with the United States Court of Federal Claims, without GAO’s prior authorization, provided that the information is filed under seal with the Court, that the Court is informed of GAO’s protective order, and that the Court is requested to issue its own protective order to cover the protected material.

In addition to complying with this requirement, Plaintiff requests a protective order because its complaint contains confidential and source selection sensitive information, such as information relating to Leidos’ proposal and the agency’s evaluation thereof. Plaintiff further notes that the

administrative record before this Court will contain confidential and sensitive source selection material, including the proprietary information Plaintiff, which should not be released publicly.

Therefore, in accordance with Appendix C, Rule 4 of the Rules of the Court of Federal Claims, Plaintiff has marked the complaint as proprietary and confidential, and is concurrently filing a proposed redacted version of this document with the Court.

Dated: November 1, 2018

Respectfully submitted,

s/J. Scott Hommer, III
J. Scott Hommer, III (counsel of record)
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